



# WORKSHOP NOTICE

June 18, 2012

BAY AREA

AIR QUALITY

MANAGEMENT

DISTRICT

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **PUBLIC WORKSHOP – DRAFT REGULATION 12, RULE 13:  
METAL MELTING AND PROCESSING OPERATIONS AND  
DRAFT REGULATION 12, RULE 14: METAL RECYCLING  
AND SHREDDING OPERATIONS**

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The staff of the Bay Area Air Quality Management District will conduct two public workshops to present, discuss, and receive comments on two new, draft Regulation 12, Rule 13: Metal Melting and Processing Facilities (Rule 12-13) and Regulation 12, Rule 14: Metal Recycling and Shredding Operations. The details of the upcoming workshops are presented below:

**Wednesday, July 11, 2012**  
**6:00pm – 8:00 p.m.**

**MTC Auditorium**  
101 Eighth Street  
Oakland, CA 94607

**Thursday, July 12, 2012**  
**2:30 – 4:30 p.m.**

**Redwood Shores Library**  
399 Marine Parkway,  
Redwood City, CA 94065

## BACKGROUND

The Bay Area Air Quality Management District (District or BAAQMD) has the authority to regulate emission of various air pollutants from stationary sources including criteria pollutants, toxic air contaminants and odorous compounds that can cause a nuisance to the general public. Metal melting and processing facilities and metal recycling and shredding facilities are sources of emissions of PM (including toxic metal particulates) and odorous substances. In the past and continuing, the District has received odor and other complaints about these operations.

## DRAFT PROPOSALS

Staff has evaluated these industrial sectors and determined that additional reductions in fugitive emissions of both PM and odorous substances may be realized that can result in improved air quality and fewer citizen complaints. Implementation of emissions minimization practices should help minimize the impacts of these facilities to nearby residences and businesses.

To address these issues, staff has developed a second draft of a new rule, Regulation 12, Rule 13: Metal Melting and Processing Facilities (Rule 12-13) and a new draft rule for metal recycling – Regulation 12, Rule 14: Metal Recycling and Shredding Operations. Rule 12-13 would affect facilities that melt and cast metals (foundries) or heat treat metals (forges). Rule 12-14 would affect facilities that recycle metals (including those with shredders). Both draft proposals would address fugitive emissions of PM and odorous substances from these facilities through the implementation of Emissions Minimization Plans (EMP) designed to reduce fugitive emissions.

**Applicability:**

- Rule 12-13: Metal Melting and Processing Operations: Foundries and forges with an annual metal throughput of one ton or more that operate furnaces or ovens permitted by the District; and
- Rule 12-14: Metal Recycling and Shredding Operations: Metal recycling facilities with an annual metal throughput of 50,000 tons or more.

**Emissions Minimization Plans:** Each affected facility must develop and submit to the District for review and approval an Emissions Minimization Plan (EMP) that would detail how the facility would address fugitive emissions from various operations:

- Rule 12-13: Foundries and forges would be required to address the following areas in their plans:
  - Mold and Core Making Operations;
  - Metal Management;
  - Furnace Operations, including tapping and pouring;
  - Forging;
  - Casting and Cooling Operations;
  - Shake-Out Operations;
  - Finishing Operations;
  - Sand Reclamation;
  - Dross and Slag Management.
- Rule 12-14: Metal recyclers would be required to address the following areas in their plans:
  - Roadways and other Trafficked Surfaces;
  - Scrap Metal:
    - Handling and storage Operations,
    - Crushing Operations,
    - Sorting Operations,
    - Shredding Operations;
  - Receipt of Scrap Metal from Providers;
  - Auto Shredding Residue (ASR) management;
  - Lead Batteries;
  - Polychlorinated Biphenyl (PCB) Capacitors;
  - Mercury Switches;
  - Sodium Azide Canisters.

The EMPs would be required to be updated at least every five years.

**Demonstration of Compliance with Applicable Federal NESHAP Requirements (Draft Rule 12-13 only):** Draft Rule 12-13 would require foundries to demonstrate compliance with certain sections of the applicable federal National Emissions Standards

for Hazardous Air Pollutants (NESHAP) that relates to: 1) the capture / collection of fugitive emissions, and 2) Operations and Maintenance Plan requirements.

**Review of Alternative Binder Formulation (Draft Rule 12-13 only):** Foundries that use mold and core binders formulated with an odorous substance would be required to research alternative binder that produce fewer odorous emissions and report the results of that research to the District once every two years.

**Recordkeeping:** Maintain the following records:

- Monthly throughput of metals melted, heated, scrapped, or recycled;
- Monthly throughput and type of binder used (Draft Rule 12-13 only); and
- Monthly throughput of sand used and replaced (Draft Rule 12-13 only).

## **INFORMATION AND COMMENTS**

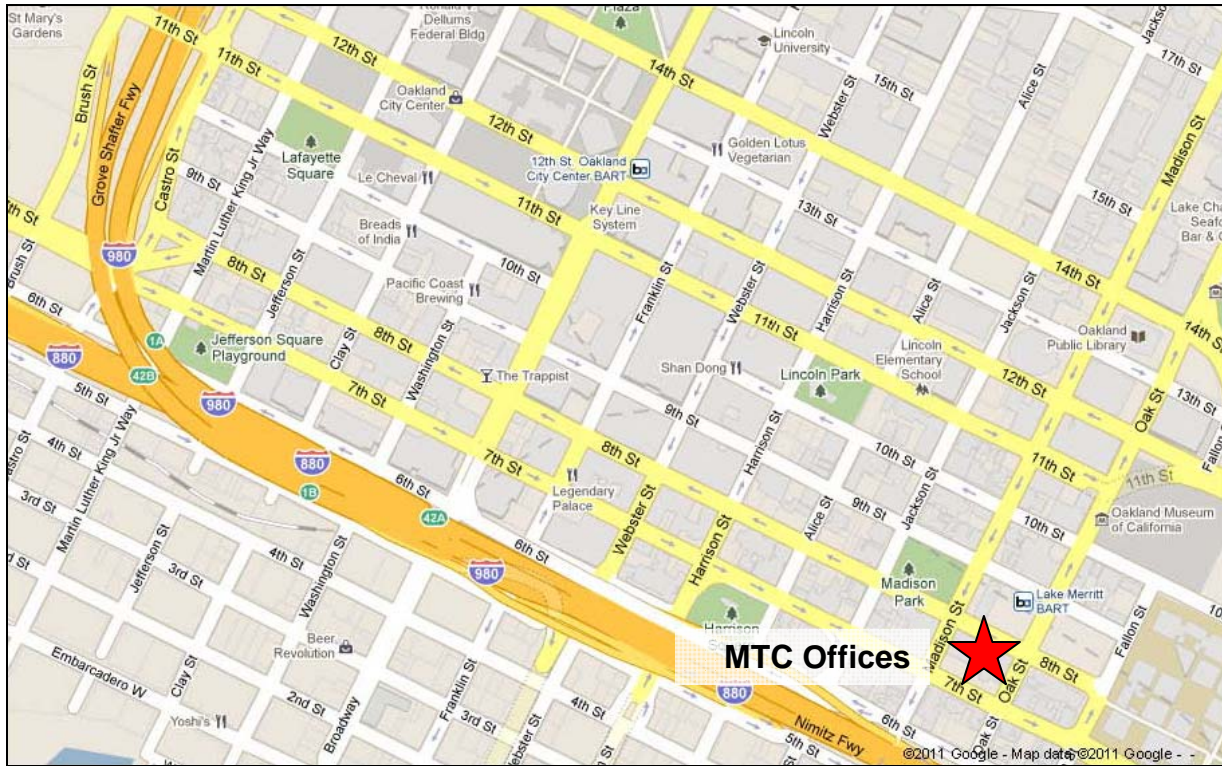
In addition to the revised draft Rule 12-13 and new draft Rule 12-14, District staff has prepared a workshop report to provide background and additional information on the draft rule. The workshops are the next step in the District's public engagement process. Staff is interested in comments and questions about the draft. Staff is also available to meet with interested parties regarding the proposal. Following the workshops and close of the public comment period, staff will assess the need for changes to the rule, and may consider further workshops or may proceed to a public hearing before the District's Board of Directors.

For copies of the draft Rules 12-13 and 12-14 and the Workshop Report, please visit our website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm>. For questions or comments on the regulatory proposal, please contact Victor Douglas at (415) 749-4752 or [vdouglas@baaqmd.gov](mailto:vdouglas@baaqmd.gov). Interested parties are invited to submit comments on the draft Rule or the Workshop Report. The deadline for comments on this proposal is July 20, 2012.

## **Maps of Workshop Locations and Public Transit Options**

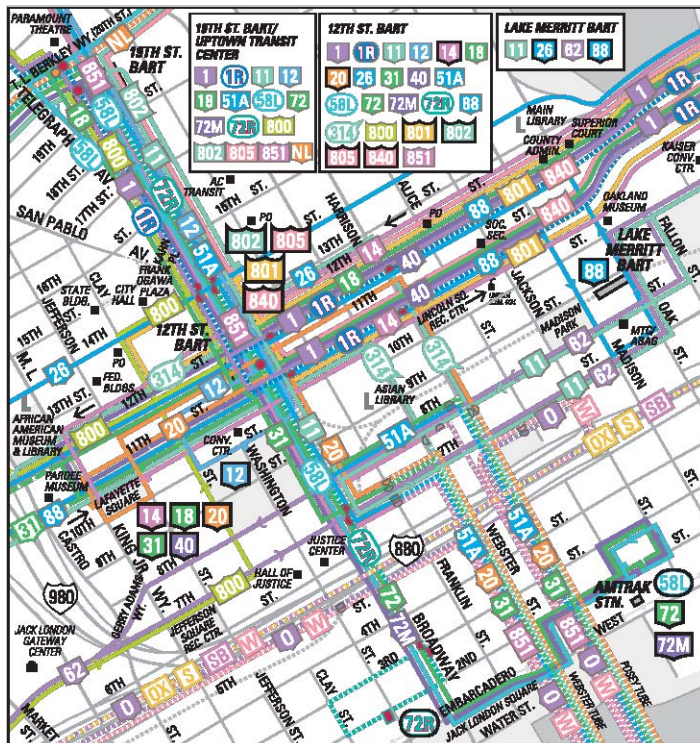
Attendees are encouraged to use public transit, rideshare, bicycle, walk or use other non-motorized transportation modes to and from the workshops.

**Metropolitan Transportation Commission (MTC)**  
 Main Auditorium  
 101 Eighth Street  
 Oakland, California 94607



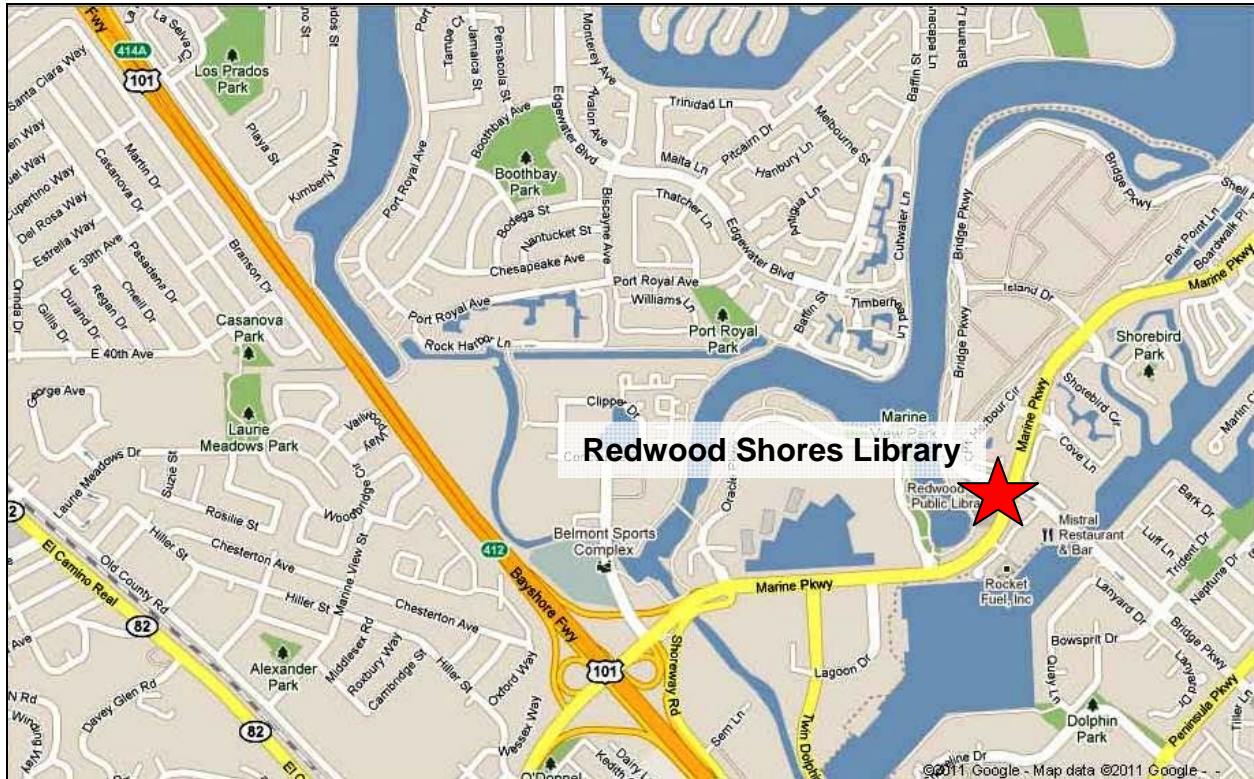
**Public Transportation Options for the MTC:**  
**BART:** Lake Merritt Station;

**AC Transit Lines:** 1R, 11, 14, 18, 20, 31, 51A, and 62



See:  
[http://www.actransit.org/pdf/maps/version\\_14/city\\_map.pdf](http://www.actransit.org/pdf/maps/version_14/city_map.pdf)

**Redwood Shores Library**  
 399 Marine Parkway,  
 Redwood City, CA 94065



**Public Transit Options for Redwood Shores Library:** San Mateo County Transit Authority (SamTrans) Bus Line 260 servicing both Belmont and San Carlos Caltrain stations. See <http://www.samtrans.org/>.

